

EXHIBIT 11

Redacted Excerpts from 30(b)(6) Deposition of Lawrence Epstein on Acquisitions

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB- (PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

CONFIDENTIAL

VIDEO RECORDED 30(b)(6) DEPOSITION OF ZUFFA, LLC

BY IKE LAWRENCE EPSTEIN

December 2, 2016

LAS VEGAS, NEVADA

11:29 A.M.

Reported by:
Sarah Padilla, CCR NO. 929
Job No: 47777

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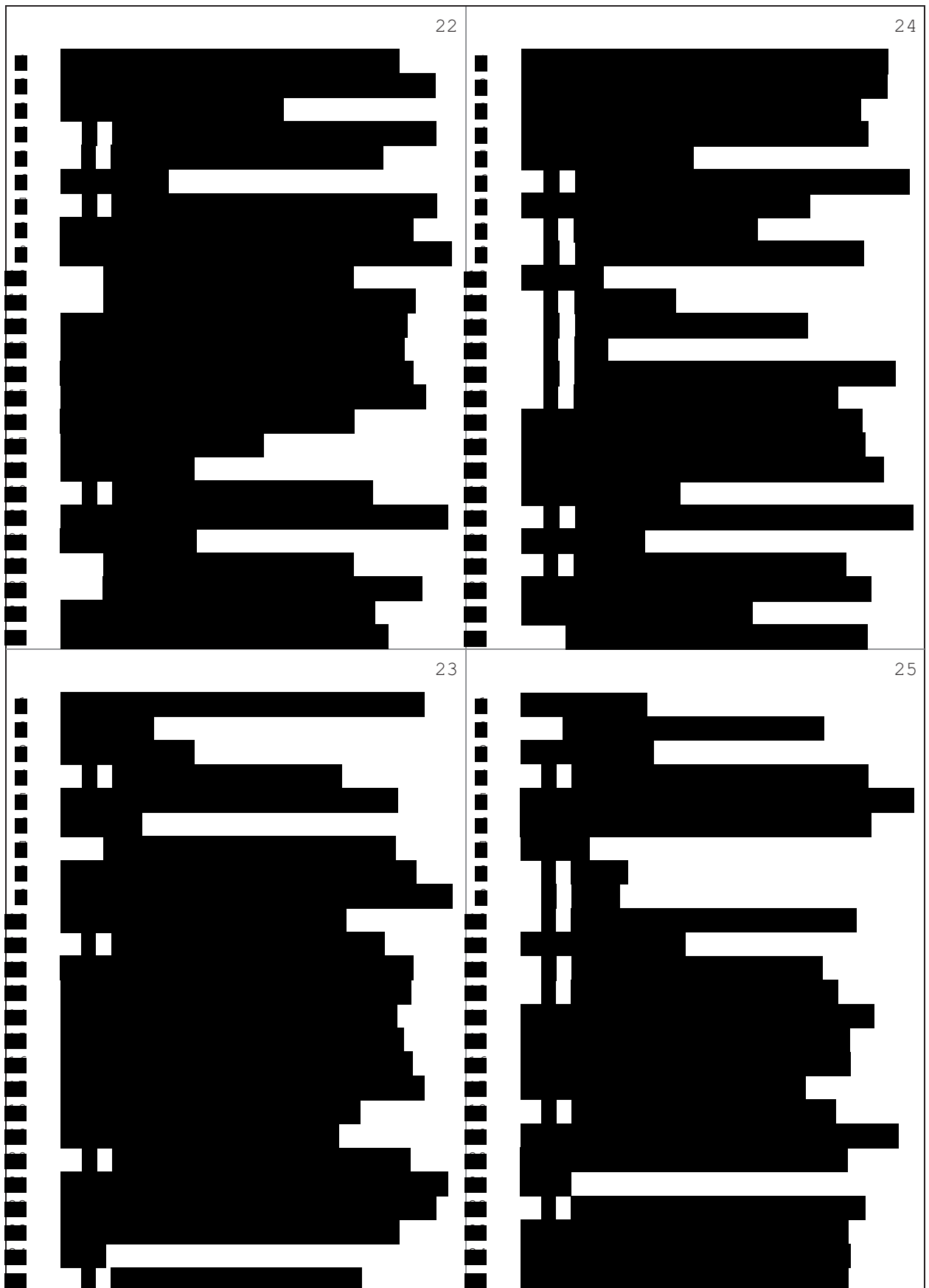
<p>14</p> <p>1 through 22?</p> <p>2 A I believe I am.</p> <p>3 Q And what did you do to become</p> <p>4 knowledgeable with respect to these topics?</p> <p>5 A What do you mean, preparing for the</p> <p>6 depositions? Or just my involvement in them? Or</p> <p>7 what do you mean by that question?</p> <p>8 Q Well, let's start with -- let's start with</p> <p>9 what you did when you were -- when you were informed</p> <p>10 that you would be the 30(b)(6) deponent? So</p> <p>11 starting at that point in time, did you review any</p> <p>12 documents to prepare yourself to testify on Topics</p> <p>13 16 through 22?</p> <p>14 A I did.</p> <p>15 Q And other than documents that were</p> <p>16 provided to you by your attorneys, can you describe</p> <p>17 to me what documents you reviewed?</p> <p>18 A Well, I guess all the documents were</p> <p>19 provided to me by my attorneys.</p> <p>20 Q Okay. So you didn't review any documents,</p> <p>21 other than the ones that your attorneys provided</p> <p>22 you?</p> <p>23 A No. I mean, they gave me some binders and</p> <p>24 I read through the stuff.</p> <p>25 Q Okay. And do you understand that you are</p>	<p>16</p> <p>9 Q I appreciate that. Thank you.</p> <p>10 MS. GRIGSBY: Counsel, just for the</p> <p>11 record, he's referring to -- you might want to mark</p> <p>12 this binder as an exhibit. We've been doing so in</p> <p>13 the past depositions.</p> <p>14 MR. WEILER: Yeah. I think it is a good</p> <p>15 time to do that. So I don't actually have -- I've</p> <p>16 kind of cannibalized my copy.</p> <p>17 MS. GRISBY: This one is not written on.</p> <p>18 You can use this one.</p> <p>19 MR. WEILER: Mark as an exhibit, Exhibit</p> <p>20 55, appears to be a binder entitled Zuffa 30(b)(6)</p> <p>21 deposition, Topic B, acquisitions, and Exhibits 1</p> <p>22 through 21 thereto.</p> <p>23 (Exhibit 55 was marked.)</p> <p>24 (Discussion off the record.)</p> <p>25</p>
<p>15</p> <p>1 here to answer questions on behalf of Zuffa, LLC</p> <p>2 about Zuffa's acquisition of other promoters of MMA</p> <p>3 events today?</p> <p>4 A Correct.</p> <p>5 Q And are you able to speak knowledgeably on</p> <p>6 Zuffa's behalf regarding Zuffa's acquisitions of MMA</p> <p>7 promoters?</p> <p>8 A Yes.</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>17</p> <p>1 BY MR. WEILER:</p> <p>2 Q Sir, have you seen this binder before?</p> <p>3 A Yes.</p> <p>4 Q When did you first see this binder?</p> <p>5 A You know, probably a couple weeks ago.</p> <p>6 Q And did you request that any additional</p> <p>7 documents be added to that binder?</p> <p>8 A No.</p> <p>9 Q And did you use this binder to prepare</p> <p>10 yourself for this deposition?</p> <p>11 A Yes.</p> <p>12 Q And how did you use this binder to prepare</p> <p>13 yourself?</p> <p>14 A Read through the documents in the binder.</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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6 (Pages 18 to 21)

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7 (Pages 22 to 25)

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<p>94</p> <p>1 (Exhibit 67 was marked.)</p> <p>2 MS. GRIGSBY: Do you have other copies?</p> <p>3 MR. WEILER: Yeah.</p> <p>4 THE WITNESS: All right. I've got it in</p> <p>5 front of me.</p> <p>6 BY MR. WEILER:</p> <p>7 Q Do you recognize this document, sir?</p> <p>8 A Yeah, I do.</p> <p>9 Q And what is this document?</p> <p>[REDACTED]</p>	<p>96</p> <p>1 68, a document bearing the Bates label ZFL-1677117</p> <p>2 through ZFL-1677189.</p> <p>3 A It is in the binder?</p> <p>4 Q It is not.</p> <p>5 A Okay.</p> <p>6 (Exhibit 68 was marked.)</p> <p>7 BY MR. WEILER:</p> <p>8 Q Do you recognize this document, sir?</p> <p>9 A No.</p> <p>[REDACTED]</p>
<p>95</p> <p>[REDACTED]</p> <p>25 Q I'd like to mark as an exhibit, Exhibit</p>	<p>97</p> <p>[REDACTED]</p>

25 (Pages 94 to 97)

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<div>98</div> <div>9 [REDACTED]</div> <div>10 Q I'd like to mark as an exhibit, Exhibit</div> <div>11 69, a document bearing the Bates label 24 -- strike</div> <div>12 that -- bearing the Bates label ZFL-2467829 going</div> <div>13 through 835.</div> <div>14 A I've got it.</div> <div>15 (Exhibit 69 was marked.)</div> <div>16 BY MR. WEILER:</div> <div>17 Q Do you recognize this document?</div> <div>18 A Not really, no.</div> <div>19 Q Do you know who prepared this document on</div> <div>20 behalf of Zuffa?</div> <div>21 A I do not know.</div> <div>22 Q Direct your attention to page 3 of the</div> <div>23 document.</div> <div>A Okay.</div>	<div>100</div> <div>[REDACTED]</div> <div>17 Q I'd like to mark as exhibit, Exhibit 70, a</div> <div>18 document bearing the Bates label ZFL-1676293 going</div> <div>19 through ZFL-1676306.</div> <div>20 (Exhibit 70 was marked.)</div> <div>21 BY MR. WEILER:</div> <div>22 Q Do you recognize this document?</div> <div>23 A Yes, I do remember this.</div>
<div>99</div> <div>[REDACTED]</div>	<div>101</div> <div>[REDACTED]</div>

26 (Pages 98 to 101)

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<div>102</div> <div>[REDACTED]</div>	<div>104</div> <div>[REDACTED]</div>
<div>103</div> <div>[REDACTED]</div>	<div>105</div> <div>[REDACTED]</div> <div>9 Q I'd like to mark as an exhibit, Exhibit</div> <div>10 71.</div> <div>11 (Exhibit 71 was marked.)</div> <div>12 BY MR. WEILER:</div> <div>13 Q The document -- it's a document bearing</div> <div>14 the Bates label ZUF-00031544, and I will represent</div> <div>15 for the record that there appears to be a document</div> <div>16 on the back that is not related at all to the</div> <div>17 document in the front. It may have been an error in</div> <div>18 how these were generated.</div> <div>19 A I've got it.</div> <div>20 Q Do you recognize this document?</div> <div>21 A No, I don't.</div> <div>[REDACTED]</div>

27 (Pages 102 to 105)

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<p>126</p> <p>[REDACTED]</p>	<p>128</p> <p>[REDACTED]</p> <p>2 MR. WEILER: Can we go off the record for</p> <p>3 a minute? I got to take a five-minute break.</p> <p>[REDACTED]</p> <p>6 THE VIDEOGRAPHER: We are off the record</p> <p>7 at 3:13.</p> <p>8 (A short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: We are back on the</p> <p>10 record at 3:24. And this marks the beginning of</p> <p>11 Media No. 4 in the deposition of Lawrence Epstein.</p> <p>12 BY MR. WEILER:</p> <p>[REDACTED]</p>
<p>127</p> <p>[REDACTED]</p>	<p>129</p> <p>[REDACTED]</p>

33 (Pages 126 to 129)

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133

34 (Pages 130 to 133)

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<p>134</p> <p>[REDACTED]</p>	<p>136</p> <p>[REDACTED]</p> <p>13 Q I'd like to mark as Exhibit 75 a document</p> <p>14 bearing the Bates label ZUF-000378347 going through</p> <p>15 8371.</p> <p>16 (Exhibit 75 was marked.)</p> <p>17 BY MR. WEILER:</p> <p>18 Q Okay. Do you recognize this document,</p> <p>19 sir?</p> <p>20 A Yes.</p> <p>21 Q What is this document?</p> <p>[REDACTED]</p>
<p>135</p> <p>[REDACTED]</p>	<p>137</p> <p>[REDACTED]</p>

35 (Pages 134 to 137)

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<p>1 2 STATE OF _____) 3) :ss 4 COUNTY OF _____) 5 6 7 I, IKE LAWRENCE EPSTEIN, the witness 8 herein, having read the foregoing 9 testimony of the pages of this deposition, 10 do hereby certify it to be a true and 11 correct transcript, subject to the 12 corrections, if any, shown on the attached 13 page. 14 15 16 _____ 17 IKE LAWRENCE EPSTEIN 18 19 20 Sworn and subscribed to before me, 21 this _____ day of _____, 2016. 22 23 _____ 24 Notary Public 25</p>	<p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over carefully 4 and make any necessary corrections. You should state 5 the reason in the appropriate space on the errata 6 sheet for any corrections that are made. 7 After doing so, please sign the errata sheet 8 and date it. 9 You are signing same subject to the changes 10 you have noted on the errata sheet, which will be 11 attached to your deposition. 12 It is imperative that you return the original 13 errata sheet to the deposing attorney within thirty 14 (30) days of receipt of the deposition transcript by 15 you. If you fail to do so, the deposition transcript 16 may be deemed to be accurate and may be used in court. 17 18 19 20 21 22 23 24 25</p>
239	241
<p>1 STATE OF NEVADA) 2) Ss 3 COUNTY OF CLARK) 4 5 I, Sarah Padilla, a duly commissioned and 6 licensed court reporter, Clark County, State of Nevada, 7 do hereby certify: That I reported the taking of the 8 deposition of the witness, IKE LAWRENCE EPSTEIN, commencing 9 on Friday, December 2, 2016, at 11:39 A.M.; That prior to 10 being examined, the witness was, by me, duly sworn to testify 11 to the truth; That thereafter I transcribed my shorthand notes 12 into typewriting and that the typewritten transcript of said 13 deposition is a complete, true, and accurate record of said 14 shorthand notes. I further certify that I am not a relative 15 or employee of any attorney or counsel of any of the parties 16 nor a relative or employee of an attorney or counsel involved 17 in said action, nor a person financially interested in the 18 action; that a request [x] has <input type="checkbox"/> has not been made to review 19 the transcript. 20 IN WITNESS WHEREOF, I have hereunto set my 21 hand in the County of Clark, State of Nevada, this 22nd 22 day of December. 23 24 _____ 25 SARAH PADILLA, CCR 929</p>	<p>1 E R R A T A 2 3 4 5 I wish to make the following changes, 6 for the following reasons: 7 8 PAGE LINE 9 _____ CHANGE: _____ 10 REASON: _____ 11 _____ CHANGE: _____ 12 REASON: _____ 13 _____ CHANGE: _____ 14 REASON: _____ 15 _____ CHANGE: _____ 16 REASON: _____ 17 _____ CHANGE: _____ 18 REASON: _____ 19 _____ CHANGE: _____ 20 REASON: _____ 21 22 23 _____ 24 WITNESS' SIGNATURE DATE 25</p>

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